

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

**DIMARIAN MOORE on Behalf of
Herself and on Behalf of All Others
Similarly Situated**

Case No. _____

Plaintiff(s),

**COLLECTIVE ACTION
JURY TRIAL DEMANDED**

V.

**MAJED DABISH, MNM EIGHT
MILE INC., MD
ENTERTAINMENT, LLC**

Defendants.

ORIGINAL COLLECTIVE ACTION COMPLAINT

I. SUMMARY

1. Defendants Majed Dabish, MD Entertainment, LLC and MNM Eight Mile Inc., who jointly own and operate Club Truth Detroit, (hereafter “Defendants”) required and/or permitted DiMarian Moore and others similarly situated (hereafter “Plaintiff” or “Plaintiffs”) to work as exotic dancers at their adult entertainment club but refused to compensate them at the applicable minimum wage. In fact, Defendants refused to compensate them whatsoever for any hours worked. Plaintiffs’ only compensation was in the form of tips from club patrons, and even those were partly confiscated by the club.

2. Defendants also violated the FLSA by failing to pay time and a half to their employees when they worked more than 40 hours a week.